

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PH

EDWARD C. HANKS, (#N-21633),
PLAINTIFF,

FILED

PH

3/28/2016

CIVIL CASE NO.

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

16-cv-2471

Judge James B. Zagel

Magistrate Judge Sidney I. Schenkier

PC9

RECEIVED

2-19-16

FEB 19 2016 EAG

2-19-16

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

V.
JENNY L. MCGARVEY, MAJOR,
INDIVIDUAL AND OFFICIAL CAPACI-
TIES: KAREN RABIDEAU, ASSIGN-
MENT OFFICER INDIVIDUAL AND
OFFICIAL CAPACITIES: TERRI
ANDERSON, ADMINISTRATIVE
REVIEW BOARD CHAIRPERSON, IN-
DIVIDUAL AND OFFICIAL CAPACI-
TARRY WILLIAM, WARDEN OF PRISON,
INDIVIDUAL AND OFFICIAL CAPACI-
TIES: JOHN BALDWIN, DIRECTOR OF
ILLINOIS DEPARTMENT OF CORREC-
TIONS INDIVIDUAL AND OFFICIAL
CAPACITIES: TAIRA J. HOBBS, CORREC-
TIONAL OFFER INDIVIDUAL AND
OFFICIAL CAPACITIES: DEREK J.
JABUREK, CORRECTIONAL OFFICER
INDIVIDUAL AND OFFICIAL CAPACI-
TIES: WILLIE JOHNSON, LIEUTENANT
INDIVIDUAL AND OFFICIAL CAPACI-
TIES: CHANA, CORRECTIONAL OFFICER
INDIVIDUAL AND OFFICIAL CAPACI-

TIES; AND SERGEANT MCDADE, IN-
DIVIDUAL AND OFFICIAL CAPACITIES.
DEFENDANTS.

THE PARTIES

PLAINTIFF EDWARD C. HANKS, ("PLAINTIFF"), PRO-SE,
AGAINST DEFENDANTS: JENNY L. MCGARVEY ("MC-
GARVEY"), KAREN RABIDEAU ("RABIDEAU"), TERRI
ANDERSON ("ANDERSON"), TARRY WILLIAMS ("WILLIAMS"),
JOHN BALDWIN ("BALDWIN"), TAIRA J. HOBBS ("HOBBS"),
DEREK J. JABUREK ("JABUREK"), WILLIE JOHNSON,
("JOHNSON"), OFFICER CHANA ("CHANA"), AND SERGEANT,
(MCDADE, STATES AS FOLLOWS:

1.) PLAINTIFF IS AND AT ALL TIMES WAS AN INMATE
CONFINED TO STATEVILLE CORRECTIONAL CENTER, LOCATED
AT 16830 ILLINOIS 53 CREST HILL, P.O. Box 112 JOLIET
ILLINOIS 60434.

2.) JOHN BALDWIN DEFENDANT, IS THE DIRECTOR
OF THE STATE OF ILLINOIS PRISONS, HE IS LEGAL-
LY RESPONSIBLE FOR THE OVERALL OPERATION
OF THE DEPARTMENT OF CORRECTIONS INCLUDING
STATEVILLE CORRECTIONAL CENTER.

3.) TARRY WILLIAMS DEFENDANT, IS THE WARDEN OF STATEVILLE CORRECTIONAL CENTER AT THE RELEVANT TIMES REGARDING THIS COMPLAINT, HE IS LEGALLY RESPONSIBLE FOR THE DAILY WELFARE OF THE PRISON

4.) JENNY L. MCGARVEY DEFENDANT IS THE MAJOR AT STATEVILLE CORRECTIONAL CENTER AND IS LEGALLY RESPONSIBLE FOR UNIT-X PROTECTIVE CUSTODY HOUSING UNIT AT ALL TIMES RELEVANT TO THIS COMPLAINT, MCGARVEY OVERSEEN THE DAILY OPERATION OF UNIT-X.

5.) TERRI ANDERSON DEFENDANT IS THE CHAIRPERSON OF THE ADMINISTRATIVE REVIEW BOARD (ARB) OF THE ILLINOIS DEPARTMENT OF CORRECTIONS AND AT ALL TIMES MENTIONED HEREIN WAS THE REVIEWING OFFICER ASSIGNED TO REVIEW INMATES GRIEVANCES.

6.) KAREN RABIDEAU DEFENDANT AN EMPLOYEE AT STATEVILLE CORRECTIONAL CENTER WAS ASSIGNMENT OFFICER AT PLACEMENT, THAT PLACED INMATES TO LIVING UNITS, JOBS PROGRAMS AND CELL MOVEMENT.

7.) WILLIE JOHNSON DEFENDANT IS A LIEUTENANT

ASSIGNED TO UNIT-X HOUSE PROTECTIVE CUSTODY TO OVERSEE THE DAILY OPERATIONS AT STATEVILLE.

8.) SERGEANT MCDADE, DEFENDANT IS ASSIGNED TO UNIT-X HOUSE AT ALL TIMES RELEVANT TO THIS COMPLAINT AND WAS RESPONSIBLE FOR THE DAILY OPERATIONS.

9.) DEREK J. TABUREK DEFENDANT, IS A CORRECTIONAL OFFICER ASSIGNED TO UNIT-X HOUSE RELEVANT AT ALL TIMES TO THIS COMPLAINT.

10.) TAIRA J. HOBBS DEFENDANT IS A CORRECTIONAL OFFICER ASSIGNED TO UNIT-X HOUSE RELEVANT AT ALL TIMES TO THIS COMPLAINT.

11.) CHANA DEFENDANT, IS A CORRECTIONAL OFFICER ASSIGNED TO UNIT-X HOUSE RELEVANT AT ALL TIMES TO THIS COMPLAINT.

JURISDICTION

12.) JURISDICTION IS PROPER PURSUANT TO 28 U.S.C. 1331 AND 1343(a)(3). THIS IS A CIVIL ACTION AUTHORIZED BY 42 U.S.C. SECTION 1983.

PLAINTIFF CLAIM FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY 28 U.S.C. 2283 AND 2284. DECLARATORY RELIEF PURSUANT TO U.S.C. SECTION 2201 AND 2202.

13.) VENUE IS PROPER IN THIS DISTRICT PURSUANT TO U.S.C. 1391(b)(2), THE PLAINTIFF CLAIMS THAT THE DEFENDANTS, OFFICIALS AT STATEVILLE CORRECTIONAL CENTER, HAVE VIOLATED THE PLAINTIFF'S 1ST, 8TH, 14TH CONSTITUTIONAL RIGHTS AND THE RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSON ACT BY 42 U.S.C. 2000 CC-1 THROUGH ACTIONS OF RETALIATION.

THIS ACTION ARISE OUT OF DEFENDANTS BALANT DISREGARD OF THEIR DUTIES RELATED TO PLAINTIFF SUBSTANTIAL RIGHTS AND PRIVILEGES THROUGH THEIR INTENTIONAL AND DELIBERATED ACTIONS TO DENY PLAINTIFF FIRST, EIGHT AND FOURTHTEEN AMENDMENTS RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES.

14.) THIS COURT HAS PERSONAL JURISDICTION OVER DEFENDANTS BECAUSE AT ALL TIMES RELEVANT TO THIS ACTION DEFENDANTS TRANSACTED BUSINESS IN ILLINOIS. MOREOVER AT ALL TIMES RELEVANT

TO THIS ACTION ECOLIBRIUM MAINTAINED SUBSTANTIAL CONTACT WITH ILLINOIS BY TRANSACTING BUSINESS WITHIN THE STATE APPROPRIATE VENUE UNDER 28 U.S.C. SECTION 1367.

15.) AFTER NUMEROUS ATTEMPTS TO RESOLVE THESE ISSUES HEREIN WITH THE DEPARTMENT OF CORRECTIONS, STATEVILLE CORRECTIONAL CENTER OFFICIALS DEFENDANTS, STAFF, I AM COMPELLED TO FILE THIS COMPLAINT.

COMMON ALLEGATIONS OF FACTS

16.) ON OR ABOUT APRIL 16, 2014 PLAINTIFF WAS DISMISSED FROM A DETAIL WORK ASSIGNMENT IN UNIT-X HOUSE APPROVED PROTECTIVE CUSTODY, AFTER INQUIRING TO UNIT-X HOUSE STAFF MAJOR MCGARVEY, LT. JOHNSON, OFFICER HOBBS AND OFFICER JABUREK, INDIVIDUALLY OR COLLECTIVELY REGARDING THE UNEQUAL PRACTICE OF ISLAMIC RELIGIOUS SERVICES AND PROGRAMS GRANTED TO GENERAL POPULATION AND THOSE GIVEN TO PROTECTIVE CUSTODY IN UNIT-X HOUSE INMATES IN VIOLATION OF THE PHILLIP MEERS DECREE NO. 75 C 96 (JULY 1, 1984) AND WILLIAMS V. LANE 851 F.2d 867.

PLAINTIFF WAS REMOVED FROM THE WORK DETAIL ASSIGNMENT UNDER THE PRETENSE OF AN ENEMY TO PLAINTIFF (SEE EXHIBITS A-1-A-4).

17.) THEREAFTER PLAINTIFF WAS CONTINUOUSLY RETALIATED AGAINST BY FIRST BEING PLACED IN DANGEROUS SITUATIONS BY RABIDEAU UNDER THE COMMAND AND INFLUENCE OF MCGARVEY, JOHNSON, HOBBS, JABUREK AND MCDADE IN UNIT-X WHICH VIOLATED PLAINTIFF'S 8th AND 14th AMENDMENTS RIGHTS OF THE UNITED STATES CONSTITUTION BY THEIR RETALITORY CONDUCT (SEE EXHIBITS B1-B-3).

18.) UPON INFORMATION AND BELIEF DEFENDANTS HOBBS, JABUREK AND MCDADE INFORMED PLAINTIFF'S CELLMATE (LASHAWN WRIGHT) TO DO BODILY HARM TO PLAINTIFF, WHEREAS PLAINTIFF AVOIDED THE INCIDENT BY BEING PLACED IN SEGREGATION BASED ON FALSE ALLEGATIONS BY JABUREK, WHICH CAUSED PLAINTIFF TO BE REMOVED FROM APPROVED PROTECTIVE CUSTODY (SEE EXHIBITS B-1-B-3), ON JUNE 20, 2014.

19.) PLAINTIFF WAS DENIED APPROVED PROTECTIVE

CUSTODY AFTER BEING RELEASE FROM SEGREGATION BASED ON NO LEGITIMATE SUBSTANTIAL RULE BY WARDEN WILLIAMS (SEE 20 ILL. ADMINISTRATIVE CODE CH. 1 SEC. 501.300 - SEC. 501.350. THEREAFTER PLAINTIFF WAS PLACED IN UNIT F-HOUSE A GENERAL POPULATION HOUSING UNIT. PLAINTIFF WAS ASSIGNED AS AN UN-APPROVED PROTECTIVE CUSTODY INMATE "OVERFLOW" FROM THE ORIGINAL PROTECTIVE CUSTODY UNIT-X HOUSE WHICH HOUSE APPROVED AND UN-APPROVED PROTECTIVE CUSTODY INMATES. PLAINTIFF WAS THE ONLY SUCH CELL IN UNIT-F AT ONE TIME FOR MONTHS, IN DIRECT VIOLATION OF THE CASE LAWS CITED ABOVE AND PLAINTIFF'S 8TH AND 14TH AMENDMENTS RIGHTS. (SEE EXHIBITS C-C1) (B-1), (D).

20.) PLAINTIFF FILED NUMEROUS GRIEVANCES CONCERNING UNIT-F HOUSE LIVING CONDITIONS, DENIED COMMISSARY, YARD PRIVILEGES, MAIL TAMPERING AND THREATS BY GENERAL POPULATION INMATES. PLAINTIFF WAS THEN PLACED BACK IN UNIT-X HOUSE UN-APPROVED FOR A SHORT TIME WHERE PLAINTIFF'S PERSONAL PROPERTY WAS CONFISCATED BOGUS BY OFFICER GEESEY AT THE DIRECTIONS BY MCGARVEY, JOHNSON AND

JABUREK EVEN THOUGH EVIDENCE PROVED OTHERWISE, BY THE DISCIPLINARY TICKET BEING EXPUNGED (SEE EXHIBITS D, E, F, G, H AND I).

21.) UPON INFORMATION AND BELIEF, BECAUSE PLAINTIFF CONTINUED TO FILE GRIEVANCES AND IS A KNOWN MUSLIM; JOHNSON STATED TO PLAINTIFF "HOBBS AND MCGARVEY DIDN'T WANT PLAINTIFF IN APPROVED PROTECTIVE CUSTODY ON THEIR WATCH OR IN UNIT-X HOUSE." SUGGESTING PLAINTIFF SHOULD BE IN GENERAL POPULATION TO BE HURT. IN FACT, EXHIBIT "J" ACKNOWLEDGES THIS TRUTH, WHILE EXHIBIT "K" IN REALITY PROVES PLAINTIFF WAS ONLY APPROVED ON PAPER (SEE ALSO EXHIBITS M & N).

22.) AGAIN, ONCE PLAINTIFF WAS HOUSED IN UNIT-X BY RABIDEAU. PLAINTIFF WAS CELLMATE WITH BRANDY MORGAN #N-13480 IN UPPER EAST-04, UPON INFORMATION AND BELIEF THIS INMATE WAS INFORMED TO DO BODILY HARM TO PLAINTIFF BY CHANA, HOBBS AND MCGARVEY. ON JUNE 16, 2015 IT WAS ACTUALIZED AND PLAINTIFF WAS ASSAULTED, BUT WAS COMPELLED TO DEFEND HIMSELF. THIS OCCURRED BECAUSE OF THE SPECIAL TIES MORGAN HAD WITH STAFF (SEE EXHIBIT 2-1-14).

PLAINTIFF WAS PHYSICALLY ASSAULTED AND WAS NOT TAKEN FOR MEDICAL TREATMENT, WHERE PLAINTIFF SUFFERED NECK & BACK INJURIES, STIFFNESS, PAIN AND SORENESS WHICH STILL CONTINUES.

23.) DESPITE PLAINTIFF REQUEST, DEFENDANTS WILLIAMS, ANDERSON, AND BALDWIN CONSISTENTLY DENIED PLAINTIFF APPROVED PROTECTIVE CUSTODY BASED ON MCGARVEY, JOHNSON, MCDADE, HOBBS, CHANA AND JABUREK INPUT AND THEIR ACTIONS OF RETALIATION BECAUSE PLAINTIFF COMPLAINTS AND GRIEVANCES ABOUT PROTECTIVE CUSTODY CONDITIONS AND DENIED OPPORTUNITIES OF DISPARITY WITH THE GENERAL POPULATION, THE UNEQUAL TREATMENT OF MUSLIM THEREOF. EVEN THOUGH PLAINTIFF HAD BEEN PREVIOUSLY APPROVED PROTECTIVE CUSTODY FOR MORE THAN 20 YEARS (SEE EXHIBIT M).

24.) PLAINTIFF HAD MADE ATTEMPTS TO COMMUNICATE WITH MCGARVEY, WHICH WAS MET WITH CONTEMPT AND VERBAL ASSAULTS WHEN MCGARVEY STATED "YOU CAN'T HAVE AN DETAIL ASSIGNMENT BECAUSE YOU ARE A MUSLIM AND CAN'T BE TRUSTED, DON'T YOU KNOW WHAT'S HAPPENING IN THE WORLD TODAY WITH MUSLIMS." UPON INFORMATION AND BELIEF THIS WAS THE

SAME BELIEF HELD BY JOHNSON, HOBBS, MCDADE, JARBUREK, CHANA AND MANY OTHER CHRISTIANS STAFF AT STATEVILLE CORRECTIONAL CENTER (SEE EXHIBITS A, B-1, E, F, G, H, AND I).

25.) DEFENDANTS WILLIAMS, ANDERSON AND BALDWIN REFUSAL TO TAKE ACTION SEVERLY AFFECTED PLAINTIFF SAFETY, PUTTING PLAINTIFF AT RISK OF DEATH (SEE EXHIBITS B-1-3, C-1-2, J AND M).

26.) PLAINTIFF HAS EXHAUSTED ALL REQUIRED REMEDIES PRIOR TO LITIGATING, INCLUDING FILING GRIEVANCES, WRITING WARDENS, STAFF AND COUNSELORS AS WELL AS THE ARB, BUT PLAINTIFF HAS NOT OBTAINED RELIEF.

COUNT-I DEPRIVATION OF RIGHTS

PLAINTIFF ADOPTS AND REALLEGES THE ALLEGATIONS OF PARAGRAPHS 1 THROUGH 26 AS THOUGH FULLY SET FORTH HEREIN AS PARAGRAPH 27 OF ITS COUNT I.

SMH

EVERY PERSON WHO, UNDER COLOR OF ANY STATUTE, ORDINANCE, REGULATION CUSTOM OR USAGE, OF ANY STATE OR TERRITORY OR DISTRICT OF COLUMBIA, SUBJECT OR CAUSES TO BE SUBJECTED ANY CITIZEN OF THE UNITED STATES OR OTHER PERSON WITHIN THE JURISDICTION THEREOF TO THE DEPRIVATION OF ANY RIGHTS, PRIVILEGES OR IMMUNITIES SECURED BY THE CONSTITUTION AND LAW, SHALL BE LIABLE TO THE PARTY INJURED IN AN ACTION AT LAW, SUIT IN EQUITY OR OTHER PROPER PROCEEDING FOR REDRESS, EXCEPT THAT IN ANY ACTION BROUGHT AGAINST A JUDICIAL OFFICER FOR AN ACT OR OMISSION TAKEN IN SUCH OFFICER'S JUDICIAL CAPACITY, INJUNCTIVE RELIEF SHALL NOT BE GRANTED UNLESS A DECLARATORY DECREE WAS VIOLATED OR DECLARATORY RELIEF WAS UNAVAILABLE 42 U.S.C. SEC. 1983. ALL EXHIBITS.

28.) PLAINTIFF ACTION CONSTITUTE A DEPRIVATION WHERE DEFENDANTS WAS OBJECTIVELY CULPABLE AS WELL AS REQUIRED TO PROVIDE PLAINTIFF WITH EQUAL TREATMENT AS A MUSLIM (SAFETY, LIVING CONDITIONS IN UNIT-X-HOUSE), AND NOT

RETALIATE AGAINST PLAINTIFF BECAUSE PLAINTIFF USED THE GRIEVANCE PROCESS, FILE LITIGATIONS OR REQUESTED THE DECREE IMPLEMENTATION OF THE MEERS, ALTHOUGH PLAINTIFF DOESN'T HAVE A RIGHT TO A DETAIL ASSIGNMENT, A PRIVILEGE ONCE OBTAINED SHOULD NOT BE TERMINATED WITHOUT DUE PROCESS OR HIS PERSONAL PROPERTY CONFISCATED WITHOUT SUCH JUST CAUSE, ALL EXHIBITS.

29.) PLAINTIFF SUFFERING SERVED ABSOLUTELY NO PENOLOGICAL PURPOSE AND WAS DONE FOR NO VAILD REASON EXCEPT FOR THE FACT PLAINTIFF IS A MUSLIM AND FILED GRIEVANCE CONCERNING UNIT-X, PROTECTIVE CUSTODY, LIVING CONDITIONS F-HOUSE UNIT AND OTHER INJUSTICE, ALL EXHIBITS.

30.) DEFENDANTS WERE SUBJECTIVELY CULPABLE AS EACH HAD SUFFICIENTLY CULPABLE STATE OF MIND DEFENDANTS WAS DIRECTLY INFORMED OF THE SITUATIONS ON NUMEROUS OCCASSIONS, INCLUDING DIRECT REQUEST FOR APPROVED PROTECTIVE CUSTODY MUSLIMS TO BE PROVIDED WITH THE SAME SERVICES AS GIVEN TO THE GENERAL POPULATION, STOP ALL THE

RETALIATION BECAUSE OF THE FILING OF GRIEVANCES, PROVIDE PLAINTIFF WITH A SAFE LIVING ENVIRONMENT - NOT UNIT-F HOUSE WITH GENERAL POPULATION OR CELLMATES COMMITTED TO DO PLAINTIFF BODILY HARM AT THE DIRECTION OF STAFF AND RETURN PLAINTIFF'S PERSONAL PROPERTY IN WHICH TICKET WAS EX-PUINGED. ALL EXHIBITS.

31.) DEFENDANTS ACTED DELIBERATED INDIFFERENCE TO THE SAFETY OF PLAINTIFF DESPITE PLAINTIFF CONSTANT AND REPEATED REQUEST TO BE RE-APPROVED PROTECTIVE CUSTODY STATUS, AND DEFENDANTS BOTH EACH INDIVIDUALLY AND COLLECTIVELY DECIDED TO IN THEIR BEST INTEREST TO IGNORE PLAINTIFF IN WHICH PLAINTIFF WAS ASSAULTED, ALL EXHIBITS.

32.) AS A RESULT OF DEFENDANTS ACTIONS PLAINTIFF SUFFERED THROUGH DIFFICULT AND TORTUROUS CONDITIONS BY REPEATED RETALIATION FOR ALMOST TWO (2) YEARS. THE PROXIMITY OF THESE ACTS HAVE CAUSED PLAINTIFF MENTALLY AND PHYSICALLY SUFFERED EFFECTS OF CRUEL AND

RETALIATION BECAUSE OF THE LIVING

UNUSUAL PUNISHMENT AND DUE PROCESS VIOLATIONS UNDER THE 1ST, 8TH, AND 14TH AMENDMENTS TO THE UNITED STATES CONSTITUTION
ALL EXHIBITS.

33.) PLAINTIFF HAVE NO PLAIN ADEQUATE OR COMPLETE REMEDY AT LAW TO REDRESS THE WRONGS DESCRIBED HEREIN. PLAINTIFF HAS BEEN ALREADY INTURED IRREPARABLY AND WILL CONTINUE TO BE BY THE CONDUCT OF THE DEFENDANTS UNLESS THIS COURT GRANT THE DECLARATORY AND INJUNCTIVE RELIEF WHICH PLAINTIFF SEEKS,
ALL EXHIBITS.

WHEREFORE, PLAINTIFF RESPECTFULLY PRAY THAT THIS COURT ENTER JUDGEMENT GRANTING PLAINTIFF:

34.) A DECLARATION THAT THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFF RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE UNITED STATES.

35.) A PRELIMINARY AND PERMANENT INJUNCTION ORDERING DEFENDANTS, MCGARVEY, RABIDEAU, WILLIAMS, BALDWIN, ANDERSON, HOBBS, CHANA, JOHNSON, JABUREK AND MCDADE TO STOP RETALIATION AGAINST PLAINTIFF FOR RELIGIOUS STATUS, USING THE GRIEVANCE PROCESS, AND DENYING PLAINTIFF EQUAL TREATMENT, SAFETY, RIGHTS AND PRIVILEGES AT STATEVILLE CORRECTIONAL CENTER, OR TRANSFER PLAINTIFF TO A PROTECTIVE CUSTODY INSTITUTION WHERE ALL THE OPPORTUNITIES PROVIDED TO GENERAL POPULATION IS GRANTED TO PLAINTIFF AS WELL WITH ONE MAN CELL STATUS.

36.) ENTER IN PLAINTIFF FAVOR AND AGAINST EACH INDIVIDUAL DEFENDANT IN SUCH AMOUNT AS WILL BE PROVEN AT TRIAL, COMPENSATORY DAMAGES OF \$20,000 JOINTLY AND SEVERALLY, PUNITIVE DAMAGES OF \$25,000 FOR EACH DEFENDANT OR AN AGGREGATE SUM OF \$2,500,000 PLUS COST AND FEES INCURRED IN BRINGING THIS

ACTION, AND FOR ANY FURTHER RELIEF THIS COURT DEEMS JUST AND APPROPRIATE.

37.) PLAINTIFF REQUEST A JURY TRIAL ON ALL TRIABLE CLAIMS.

RESPECTFULLY SUBMITTED,

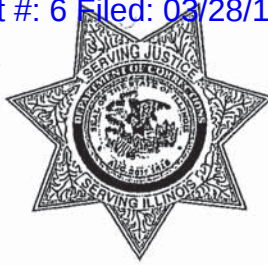
Edward Hanks N-21633
EDWARD HANKS,
P.O. Box 112 JOLIET, IL.
60434

VERIFICATION

I HAVE READ THE FOREGOING COMPLAINT AND HEREBY VERIFY THAT MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT AS TO MATTERS ALLEGED UPON INFORMATION AND BELIEF AND, AS TO THOSE I BELIEVE THEM TO BE TRUE. I CERTIFY UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY RECOLLECTION.

EXECUTED AT JOLIET, IL.
ON 2-11-16

EXHIBIT A-1

Bruce Rauner
GovernorJohn Baldwin
Acting Director

The Illinois Department of Corrections

1301 Concordia Court, P.O. Box 19277 • Springfield, IL 62794-9277 • (217) 558-2200 TDD: (800) 526-0844

Offender Name: HANKS, EdwardDate: 11-2-15Register #: N21633Facility: Stateville CC

This is in response to your grievance received on 12-30-14. This office has determined the issue will be addressed without a formal hearing. A review of the Grievance, Grievance Officer/CAO response to the grievance has been conducted. For a grievance that is direct review by the ARB, a review of the Grievance has been conducted.

Your issue regarding: Grievance dated: 9-12-14 Grievance Number: 3223 Griev Loc: SKA

- ☐ Transfer denied by the Facility or Transfer Coordinator
- ☐ Dietary
- ☐ Personal Property
- ☐ Mailroom/Publications
- ☐ Assignment (job, cell)

- ☐ Commissary
- ☐ Trust Fund
- ☐ Conditions (cell conditions, cleaning supplies)
- ☐ Disciplinary Report dated _____ Incident # _____

☒ Other Rights/Privileges while in CC

Based on a review of all available information, this office has determined your grievance to be:

- ☐ Affirmed, Warden _____ is advised to provide a written response of corrective action to this office by _____
- ☐ Denied, in accordance with DR504F, this is an administrative decision.
- ☐ Denied, this office finds the issue was appropriately addressed by the facility Administration.
- ☐ Denied in accordance with AD05.03.103A (Monetary Compensation for Inmate Assignments)
- ☐ Denied, as the transfer denial by the facility/TCO on _____ was reviewed in accordance with transfer procedures and is an administrative decision.

- ☐ Denied as the facility is following the procedures outlined in DR525.
- ☐ Denied as Cell Assignment/Housing is consistent with the Department's determination of the appropriate Operational capacity of each facility.
- ☐ Denied as procedures were followed in accordance with DR 420 for removal/denial of an offender from/for an assignment.
- ☐ Denied as this office finds no violation of the offender's due process in accordance with DR504.80 and DR504.30. This office is reasonably satisfied the offender committed the offense cited in the report.

Other: Denied

Contact made with Chaplain's office to Request visit from Muslim Representative. Does not meet criteria for education at this time. Job assignments at department SCAO

FOR THE BOARD: Terri Anderson

Terri Anderson
Administrative Review Board

CONCURRED: John R. Baldwin

John R. Baldwin
Acting Director

CC: Warden, Stateville

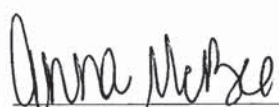
Correctional Center

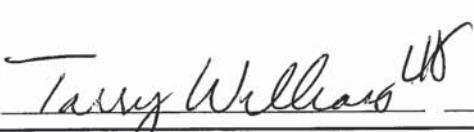
Register No. N21633

Mission: To serve justice in Illinois and increase public safety by promoting positive change in offender behavior, operating successful reentry programs, and reducing victimization.

www.illinois.gov/idoc

ILLINOIS DEPARTMENT OF CORRECTIONS
RESPONSE TO COMMITTED PERSON'S GRIEVANCEX-OW-01
EXHIBIT A2

Grievance Officer's Report		
Date Received: <u>5/19/14</u>	Date of Review: <u>6/27/14</u>	Grievance # (optional): 1535
Committed Person: Edward Hanks		ID#: N21633
Nature of Grievance: Staff Conduct – Performance of Duty		
<p>Facts Reviewed: Grievant wants C. Brown, N02101, removed from his keep separate from list.</p> <p>A check of OTS does not show C. Brown, N02101, as an enemy claims by the grievant or vice versa.</p>		
<p>Recommendation: Issue appears to be resolved.</p>		
Anna McBee, CCH <small>Print Grievance Officer's Name</small>		 <small>Grievance Officer's Signature</small>
<small>(Attach a copy of Committed Person's Grievance, including counselor's response if applicable)</small>		

Chief Administrative Officer's Response		
Date Received: <u>7/1/14</u>	<input checked="" type="checkbox"/> I concur <input type="checkbox"/> I do not concur <input type="checkbox"/> Remand	
<p>Comments:</p>		
 <small>Chief Administrative Officer's Signature</small>		<u>7/2/14</u> <small>Date</small>

Committed Person's Appeal To The Director		
<p>I am appealing the Chief Administrative Officer's decision to the Director. I understand this appeal must be submitted within 30 days after the date of the Chief Administrative Officer's decision to the Administrative Review Board, P.O. Box 19277, Springfield, IL 62794-9277. (Attach a complete copy of the original grievance, including the counselor's response, if applicable, and any pertinent documents.)</p>		
_____ <small>Committed Person's Signature</small>	_____ <small>ID#</small>	_____ <small>Date</small>

EXHIBIT A-3

Mr. Edward Hanks
X-House U-E-04
May 9, 2015
N-21633

Ms. Miles CCTI
Clinical Service

Dear Ms. Miles,

I am requesting you to initiate the process of removing one Basil Powell A-63927 from my enemy list. I just discovered this long time associate original name and was surprise he was on my enemy list since 2000, Although my current denial by the ARB list only one enemy. It just goes to the point that errors are being made beyond my control.

Thank you for your time and service concerning this matter.

I CAN NOT LOCATE THE ABOVE, WHERE DID YOU
GET THIS INFORMATION?
From. MUE

20

Sincerely,
Edward Hanks

Mr. Edward Hanks N-21633
X-House UE-04

Clinical Service
Ms. Miles CCTI

State of Illinois }
County of Will } ss:

Affidavit

I, Corwyn Brown, #No2101, do hereby state and depose that the following is true and correct to the best of my knowledge and belief— That I have never had any form of conflict or confrontation with inmate Edward Hanks. I never had any contact with Mr. Hanks that would lead to individual conflict. That since 2003, til approx. 2009, I and Mr. Hanks resided at Menard in its North I Protective Custody unit where we went to recreation, shower, chow, chapel and law library together. And I worked as the unit barber and Mr. Hanks was the gallery worker. There was never an issue or problem between us. In 2010, when transferred to Stateville C.C. I and Hanks did everything together there was never a issue.

For these reasons and the adverse effects of seperation from the rest of the P.C. inmates, inability to receive an assignment because I am declared on his enemy list. I hereby request to be removed formerly due to it being an error or something. In 2000, when he declared me as an enemy. I was at Menard and not around Mr. Hanks. Please remove me from Mr. Hanks enemy list. End —.

I, Corwyn Brown — No2101, do hereby declare under penalty of perjury that the foregoing is true and correct.

May 4, 2014

Corwyn Brown

CORWYN BROWN #NO2101
STATEVILLE CORRECTIONAL CENTER
POST OFFICE BOX 112
JOLIET, ILLINOIS. 60434

2/4

MR.

STATE OF ILLINOIS -- DEPARTMENT OF CORRECTIONS

EXHIBIT-B-1

ADJUSTMENT COMMITTEE
FINAL SUMMARY REPORT

Name: HANKS, EDWARD

IDOC Number: N21633

Race: BLK

Hearing Date/Time: 6/25/2014 09:16 AM

Living Unit: STA-X-UW-01

Orientation Status: N/A

Incident Number: 201401859/1 - STA

Status: Final

Date	Ticket #	Incident Officer	Location	Time
6/20/2014	201401859/1-STA	JABUREK, DEREK J	X-HOUSE	09:00 AM

Offense	Violation	Final Result
307	Unauthorized Movement	Guilty
403	Disobeying A Direct Order	Guilty

Witness Type	Witness ID	Witness Name	Witness Status
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No Witness Requested

RECORD OF PROCEEDINGS

Inmate Hanks N21633 present and DR read. I/M Hanks pleads guilty. Hanks stated that he asked for a crisis team earlier that day and his cell was still open. Hanks said he thought the C/O nodded for him to step out so he did.

BASIS FOR DECISION

R/O reflects that while keying out the feed line I/M Hanks N21633 of cell XLW-04 stepped out of his cell. R/O ordered Hanks to step back in cell and lock up, Hanks replied "Naw I ain't goin back in." I/M Hanks was identified by his state issued photo id. I/M Hanks plead guilty to the charges. The committee is satisfied that inmate Hanks did in fact violate the charges cited.

DISCIPLINARY ACTION (Consecutive to any priors)

RECOMMENDED

1 Months C Grade
15 Days Segregation
1 Months Commissary Restriction
Basis for Discipline: Nature Of Offense

FINAL

1 Months C Grade
15 Days Segregation
1 Months Commissary Restriction

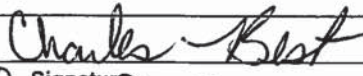
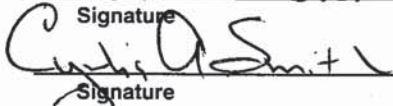
Signatures

Hearing Committee

BEST, CHARLES F - Chair Person

SMITH, CYNTHIA A

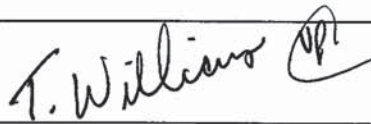
Recommended Action Approved

	06/25/14	BLK
Signature	Date	Race
	06/25/14	WHI
Signature	Date	Race

Final Comments: N/A

TARRY D WILLIAMS / VPC 7/9/2014

Chief Administrative Officer




07/09/14

Signature

Date

The committed person has the right to appeal an adverse decision through the grievance procedure established by Department Rule 504: Subpart F.


Employee Serving Copy to Committed Person

22

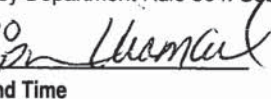
7/24/14 2:00 pm 
When Served -- Date and Time

EXHIBIT B-1

Stateville Correctional Center
WARDEN'S BULLETIN #2015-71

September 15, 2015

TO: ALL STAFF

RE: IDOC MISSION AND VISION STATEMENTS

MISSION:

To serve justice in Illinois and increase public safety by promoting positive change in offender behavior, operating successful reentry programs, and reducing victimization.

VISION:

- * • We will operate safe, secure, and humane correctional facilities.
- * • We will provide quality services to those who require medical and mental health treatment.
- * • We will evaluate offenders individually and develop an appropriate course of action based on individual needs.
 - We will reduce recidivism by offering seamless, efficient services that are geared toward offender rehabilitation.
- * • Staff is our greatest asset and we will ensure that all staff is trained to the highest professional level.
- * • This is a team-based environment where open communication and sharing new ideas are encouraged.
- * • We value the well-being of IDOC staff and offenders and will serve the people of Illinois with compassion and fairness.

Nicholas Lamb
A/W of Operations

****TO BE READ AT ROLL CALL FOR SEVEN (7) CONSECUTIVE DAYS****

NL/tlw

Bulletin
Staff
STA/NRC/MSU
Northern Region Deputy Director

EXHIBIT B-3

Illinois
Department of
Corrections

BRUCE RAUNER
Governor

Donald Stolworthy
Director

1301 Concordia Court / P.O. Box 19277 / Springfield IL 62794-9277 / Telephone: (217) 558-2200 / TDD: (800) 526-0844

Offender Name: Hanks, Edward

Date: 6/11/15

Register # N21633

Facility: Stateville CC

This is in response to your grievance received on 1/23/15. This office has determined the issue will be addressed without a formal hearing. A review of the Grievance, Grievance Officer/CAO response to the grievance has been conducted. For a grievance that is direct review by the ARB, a review of the Grievance has been conducted.

Your issue regarding: Grievance dated: 10/28/14 Grievance Number: 3750 Griev Loc: Stateville

- ☐ Transfer denied by the Facility or Transfer Coordinator
- ☐ Dietary _____
- ☐ Personal Property _____
- ☐ Mailroom/Publications _____
- ☐ Assignment (job, cell) _____

- ☐ Commissary _____
- ☐ Trust Fund _____
- ☐ Conditions (cell conditions, cleaning supplies)
- ☐ Disciplinary Report dated _____ Incident # _____

☒ Other: Staff Conduct - K. Rabideau
responsibility safety & privileges

Based on a review of all available information, this office has determined your grievance to be:

- ☐ Affirmed, Warden _____ is advised to provide a written response of corrective action to this office by _____.
- ☐ Denied, in accordance with DR504F, this is an administrative decision.
- ☒ Denied, this office finds the issue was appropriately addressed by the facility Administration.
- ☐ Denied in accordance with AD05.03.103A (Monetary Compensation for Inmate Assignments)
- ☐ Denied, as the transfer denial by the facility/TCO on _____ was reviewed in accordance with transfer procedures and is an administrative decision.
- ☐ In addition, property items are to be disposed of in accordance with DR501C.

- ☐ Denied as the facility is following the procedures outlined in DR525.
- ☐ Denied as Cell Assignment/Housing is consistent with the Department's determination of the appropriate Operational capacity of each facility.
- ☐ Denied as procedures were followed in accordance with DR 420 for removal/denial of an offender from/for an assignment.
- ☐ Denied as this office finds no violation of the offender's due process in accordance with DR504.80 and DR504.30. This office is reasonably satisfied the offender committed the offense cited in the report.
- ☐ Denied as the security staff are following the established schedule for dispensing cleaning supplies to the offender when possible.

☒ Other: Staff misconduct cannot be substantiated

FOR THE BOARD:

Leslie McCarty
Leslie McCarty
Administrative Review Board

CONCURRED:

Donald Stolworthy
Donald Stolworthy
Director

CC:

Warden,

Stateville
Hanks, Edward

Correctional Center

Register No. N21633

NA
6/12/15

EXHIBIT C-1

PLEASE SIGN & RETURN TO LAW LIBRARY!

WORK ORDER REQUEST FORM

DATE RECEIVE:

RESEARCHED BY:

NAME: Hanks I.D.# N 21633 LOCATION: X-UE-04

This inmate has requested legal assistance. Materials requested are listed:

PER Counselor, once you are Released
FOR SEG, you can request PC by
Completing a PC Contract and it being
approved by the Shift Commander. At that
point, you will be placed at the PCU or
in a PC cell at F-house

Also: PER MR. Baldwin Your case
is pending review

Signature of approval: T. Daniel (STAFF)

Case Law: # of Cases, Total # of Pages _____ Buy: _____

Copies: _____ Cost: _____

WORK ORDER DELIVERED ON: 5/22/15 BY: Mail

Acknowledge receipt of the copies and agree to pay the amount: _____

RESIDENT NAME AND NUMBER Edward Hanks N-21633

25

SIGN & RETURN:

EXHIBIT-C-2



Illinois
Department of
Corrections

Bruce Rauner
Governor

Donald Stolworthy
Director

Stateville Correctional Center
Route 53, P.O. Box 112
Joliet, IL 60434

Telephone: (815) 727 -3607
TDD: (800) 526-0844

May 22, 2015

Inmate: Edward Hanks- N21633- X-UE-04

RE: Inmate Issues- PC

Dear Mr. Hanks:


This is in response to your recent communication to me regarding an issue or concern that you expressed. Your concerns are being reviewed and referred if necessary to the appropriate individual for resolution.

DR 501.320 does state in part that when considering placement for an offender in PC, his *disciplinary history* is also to be considered (among a lot of other things). PC is a privilege not a right.

If there is a need for additional information or a formal response you will be notified in writing. I appreciate that you took the time to communicate your concerns and observations to me.

I trust this is responsive to your request.

Sincerely


Tarry Williams
Warden

TW/jal

EXHIBIT-D

STATE OF ILLINOIS
County of WILL SS

ATTESTATION

I, BRIAN DUGAN, AFFIANT, deposes AND STATES THAT I HAVE PERSONAL KNOWLEDGE OF THE FACTS SET FORTH IN THIS INSTRUMENT, THAT I AM COMPETENT TO TESTIFY AND IF CALLED TO TESTIFY WOULD STATE AS FOLLOWS:

1. I AM AN INMATE WHO HAS BEEN INCARCERATED IN THE ILLINOIS DEPARTMENT OF CORRECTIONS, STATEVILLE BRANCH, FROM NOVEMBER 1, 2012 THROUGH DECEMBER 7, 2014. ("SCC")

2. DURING MY TIME IN SCC I SPENT APPROXIMATELY 9 MONTHS IN F-HOUSE ("THUNDERDOME") AS EITHER AN ADMINISTRATIVE DETENTION, DISCIPLINARY SEGREGATION OR PROTECTIVE CUSTODY PRISONER. ("PC")

3. MY CONDITIONS OF CONFINEMENT AS A PROTECTIVE CUSTODY PRISONER IN THE THUNDERDOME FAILED TO PROVIDE PC INMATES PHYSICAL ACCESS TO THE LIBRARY FACILITIES, COMMUNAL DINING PRIVILEGES, ACADEMIC OR VOCATIONAL SCHOOLING, ACCESS TO THE GYM, JOBS AND/OR RELIGIOUS SERVICES.

4. FOOD IS DELIVERED TO PC INMATES IN THE THUNDERDOME IN A SMALL STYROFOAM TRAY, SMALLER PORTION SIZES, NO CONDIMENTES, NO SALT OR PEPPER, NO JUICE AND THE FOOD IS ALWAYS COLD.

5. INSECTS, ESPECIALLY COCKROACHES, AND VERMIN, INFEST THE THUNDERDOME, CRAWLING ALL OVER THE CELLHOUSE AND INMATE LIVING AREAS. BIRDS LIVE IN THE CELLHOUSE. AS A RESULT OF THESE INFESTATIONS THE SURFACES IN EACH CELL I'VE OCCUPIED UNDER THE THUNDERDOME ARE CONTAMINATED WITH EXCREMENT FROM THESE CREATURES. ROACH FECES ARE TINY BROWN PIN HEAD SIZED FILTH THAT ARE EXTREMELY DIFFICULT TO SEE AND CLEAN.

6. THE EXTERMINATOR VISITS THE PRISON FREQUENTLY. HE DOES NOT SPRAY THE ENTIRE CELLHOUSE NOR THE INTERIORS OF MOST CELLS. MOUSE TRAPS ARE NOT DEPLOYED ALL OVER THE CELLHOUSE. BASED ON INFORMATION AND BELIEF IT APPEARS THAT THE EXTERMINATORS EFFORTS TO ERADICATE PESTS IS INADEQUATE.

7. I WAS INCARCERATED IN SCC'S THUNDERDOME FOR BRIEF PERIODS BETWEEN 1986 AND 2014. THE THUNDERDOME WAS INFESTED WITH INSECTS AND VERMIN AT THOSE TIMES AS WELL. BIRDS FLEW THROUGHOUT THE CELLHOUSE.

EXHIBIT-D
CONTINUE

8. I witnessed the exterminator Fill up his empty sprayer during his Tour of X-house in 2013. He used water From THE TAP IN THE Lower center Mop room AFTER he ran out OF poison. Based on information AND belief THE INSUFFICIENT EXTERMINATION OF Pests IS INTENTIONAL, in order TO Continue THE prison pest extermination contract TO garner Money For Kick backs TO IDOC Kleptocrats.

9. THE THUNDERDOME'S INFRASTRUCTURE IS crumbling into dis-repair. Cells have Broken windows, malfunctioning radiators, Leaking Toilets, Sinks, Ceilings AND decades of old paint peeling OFF THE WALLS.

10. THE telephones ON THE gallery WHERE PC IS Housed IS Controlled by general population inmates who routinely deny PC inmates Access TO phone calls.

11. THE THUNDERDOME derives ITS NICKNAME From THE CONSTANT NOISE generated by THE 450 MEN INCARCERATED IN THE UNIT. THE Cellhouse HAS NO sound dampening tiles INSTALLED ON SURFACES TO CONTROL NOISE NOR does THE Administration ENFORCE A NOISE policy. Based on Belief AND INFORMATION THE NOISE IN THE THUNDERDOME constantly rumbles At A range OF 50 TO 80 decibels From 7 A.M. TO 1 AM ON THE VAST MAJORITY OF DAYS.

Verification By Certification

Under penalties AS provided by Law pursuant to SECTION 1-109 OF THE Code of Civil procedure, the undersigned certifies that the STATEMENTS Set Forth in THIS instrument ARE TRUE AND correct, except to matters therein STATED TO be ON INFORMATION AND belief AND AS TO SUCH MATTERS THE undersigned certifies AS AFORESAID that he Verily believes SAME TO be TRUE.

AFFIANT Further Sayeth Naught

DATED: December 17, 2014

AFFIANT: 

BRIAN DUPAN
A60862

Thunderdome 359

28

EXHIBIT-E

Illinois
Department of
Corrections

BRUCE RAUNER
Governor

Donald Stolworthy
Director

1301 Concordia Court / P.O. Box 19277 / Springfield IL 62794-9277 / Telephone: (217) 558-2200 / TDD: (800) 526-0844

Offender Name: Hanks, Edward

Date: 6/11/15

Register # W21633

Facility: Stateville CC

This is in response to your grievance received on 1/23/15. This office has determined the issue will be addressed without a formal hearing. A review of the Grievance, Grievance Officer/CAO response to the grievance has been conducted. For a grievance that is direct review by the ARB, a review of the Grievance has been conducted.

Your issue regarding: Grievance dated: 12/8/14 Grievance Number: 34 Griev Loc: Stateville

- ☐ Transfer denied by the Facility or Transfer Coordinator
- ☐ Dietary _____
- ☐ Personal Property _____
- ☐ Mailroom/Publications _____
- ☐ Assignment (job, cell) _____

- ☒ Commissary Denied to shop by
C/O Durrett
- ☐ Trust Fund _____
- ☐ Conditions (cell conditions, cleaning supplies)
- ☐ Disciplinary Report dated _____
Incident # _____
- ☐ Other _____

Based on a review of all available information, this office has determined your grievance to be:

- ☐ Affirmed, Warden _____ is advised to provide a written response of corrective action to this office by _____
- ☐ Denied, in accordance with DR504F, this is an administrative decision.
- ☒ Denied, this office finds the issue was appropriately addressed by the facility Administration.
- ☐ Denied in accordance with AD05.03.103A (Monetary Compensation for Inmate Assignments)
- ☐ Denied, as the transfer denial by the facility/TCO on _____ was reviewed in accordance with transfer procedures and is an administrative decision.
- ☐ In addition, property items are to be disposed of in accordance with DR501C.
- ☐ Denied as the facility is following the procedures outlined in DR525.
- ☐ Denied as Cell Assignment/Housing is consistent with the Department's determination of the appropriate Operational capacity of each facility.
- ☐ Denied as procedures were followed in accordance with DR 420 for removal/denial of an offender from/for an assignment.
- ☐ Denied as this office finds no violation of the offender's due process in accordance with DR504.80 and DR504.30. This office is reasonably satisfied the offender committed the offense cited in the report.
- ☐ Denied as the security staff are following the established schedule for dispensing cleaning supplies to the offender when possible.

☒ Other: Discipline of staff is an administrative decision

FOR THE BOARD:

Leslie McCarty
Leslie McCarty
Administrative Review Board

CONCURRED:

Donald Stolworthy
Donald Stolworthy
Director

CC: Warden, Stateville Correctional Center
Hanks, Edward Register No. W21633

EXHIBIT-F



Illinois
Department of
Corrections

BRUCE RAUNER
Governor

Donald Stolworthy
Director

1301 Concordia Court / P.O. Box 19277 / Springfield IL 62794-9277 / Telephone: (217) 558-2200 / TDD: (800) 526-0844

Offender Name: Hanks, Edward

Date: 4/1/15

Register # N21633

Facility: Stateville

This is in response to your grievance received on 10/30/15. This office has determined the issue will be addressed without a formal hearing. A review of the Grievance, Grievance Officer/CAO response to the grievance has been conducted. For a grievance that is direct review by the ARB, a review of the Grievance has been conducted.

Your issue regarding: Grievance dated: 9/25/14 Grievance Number: 3221 Griev Loc: Stateville

- | | |
|---|--|
| <input type="radio"/> Transfer denied by the Facility or Transfer Coordinator | <input type="radio"/> Commissary |
| <input type="radio"/> Dietary | <input type="radio"/> Trust Fund |
| <input type="radio"/> Personal Property | <input type="radio"/> Conditions (cell conditions, cleaning supplies) |
| <input checked="" type="radio"/> Mailroom/Publications <u>Empty Envelopes</u> | <input type="radio"/> Disciplinary Report dated _____ Incident # _____ |
| <input type="radio"/> Assignment (job, cell) | <input type="radio"/> Other |

Based on a review of all available information, this office has determined your grievance to be:

- | | |
|--|--|
| <input type="radio"/> Affirmed, Warden _____ is advised to provide a written response of corrective action to this office by _____ | <input checked="" type="radio"/> Denied as the facility is following the procedures outlined in DR525. |
| <input type="radio"/> Denied, in accordance with DR504F, this is an administrative decision. | <input type="radio"/> Denied as Cell Assignment/Housing is consistent with the Department's determination of the appropriate Operational capacity of each facility. |
| <input checked="" type="radio"/> Denied, this office finds the issue was appropriately addressed by the facility Administration. | <input type="radio"/> Denied as procedures were followed in accordance with DR 420 for removal/denial of an offender from/for an assignment. |
| <input type="radio"/> Denied, in accordance with AD05.03.103A (Monetary Compensation for Inmate Assignments) | <input type="radio"/> Denied as this office finds no violation of the offender's due process in accordance with DR504.80 and DR504.30. This office is reasonably satisfied the offender committed the offense cited in the report. |
| <input type="radio"/> Denied, as the transfer denial by the facility/TCO on _____ was reviewed in accordance with transfer procedures and is an administrative decision. | <input type="radio"/> Denied as the security staff are following the established schedule for dispensing cleaning supplies to the offender when possible. |
| <input type="radio"/> In addition, property items are to be disposed of in accordance with DR501C. | |

☒ Other: Monetary compensation is beyond the scope of the ARB

FOR THE BOARD: Leslie McCarty
Leslie McCarty
Administrative Review Board

CONCURRED: Donald Stolworthy
Donald Stolworthy
Director

CC: Warden, Stateville Correctional Center
Hanks, Edward Register No. N21633

EXHIBIT-G

Illinois
Department of
Corrections

BRUCE RAUNER
Governor

Donald Stolworthy
Director

1301 Concordia Court / P.O. Box 19277 / Springfield IL 62794-9277 / Telephone: (217) 558-2200 / TDD: (800) 526-0844

Offender Name: Hanks, Edward

Date: 4-22-15

Register # N21633

Facility: Stateville CC

This is in response to your grievance received on 11/6/14. This office has determined the issue will be addressed without a formal hearing. A review of the Grievance, Grievance Officer/CAO response to the grievance has been conducted. For a grievance that is direct review by the ARB, a review of the Grievance has been conducted.

Your issue regarding: Grievance dated: 9/26/14 Grievance Number: 3215 Griev Loc: Stateville

- | | |
|---|--|
| <input type="radio"/> Transfer denied by the Facility or Transfer Coordinator | <input type="radio"/> Commissary |
| <input type="radio"/> Dietary | <input type="radio"/> Trust Fund |
| <input type="radio"/> Personal Property | <input type="radio"/> Conditions (cell conditions, cleaning supplies) |
| <input type="radio"/> Mailroom/Publications | <input type="radio"/> Disciplinary Report dated _____ Incident # _____ |
| <input type="radio"/> Assignment (job, cell) | <input checked="" type="radio"/> Other <u>Staff Conduct - Failure of Counselor</u> |

Based on a review of all available information, this office has determined your grievance to be: Hanna to process grievance

- | | |
|--|--|
| <input type="radio"/> Affirmed, Warden _____ is advised to provide a written response of corrective action to this office by _____ | <input type="radio"/> Denied as the facility is following the procedures outlined in DR525. |
| <input type="radio"/> Denied, in accordance with DR504F, this is an administrative decision. | <input type="radio"/> Denied as Cell Assignment/Housing is consistent with the Department's determination of the appropriate Operational capacity of each facility. |
| <input checked="" type="radio"/> Denied, this office finds the issue was appropriately addressed by the facility Administration. | <input type="radio"/> Denied as procedures were followed in accordance with DR 420 for removal/denial of an offender from/for an assignment. |
| <input type="radio"/> Denied in accordance with AD05.03.103A (Monetary Compensation for Inmate Assignments) | <input type="radio"/> Denied as this office finds no violation of the offender's due process in accordance with DR504.80 and DR504.30. This office is reasonably satisfied the offender committed the offense cited in the report. |
| <input type="radio"/> Denied, as the transfer denial by the facility/TCC on _____ was reviewed in accordance with transfer procedures and is an administrative decision. | <input type="radio"/> Denied as the security staff are following the established schedule for dispensing cleaning supplies to the offender when possible. |
| <input type="radio"/> In addition, property items are to be disposed of in accordance with DR501C. | |
| <input type="radio"/> Other: _____ | |

FOR THE BOARD: Leslie McCarty
Administrative Review Board

CONCURRED: Donald Stolworthy
Director

CC: Warden, Stateville Correctional Center
Hanks, Edward Register No. N21633



Illinois
Department of
Corrections

BRUCE RAUNER
Governor

Donald Stolworthy
Director

1301 Concordia Court / P.O. Box 19277 / Springfield IL 62794-9277 / Telephone: (217) 558-2200 / TDD: (800) 526-0844

Offender Name: Hanks, Edward

Date: 4-22-15

Register # W21633

Facility: Stateville CC

This is in response to your grievance received on 11/21/14. This office has determined the issue will be addressed without a formal hearing. A review of the Grievance, Grievance Officer/CAO response to the grievance has been conducted. For a grievance that is direct review by the ARB, a review of the Grievance has been conducted.

Your issue regarding: Grievance dated: 9/12/14 Grievance Number: 3185 Griev Loc: Stateville

- | | |
|---|---|
| <input type="radio"/> Transfer denied by the Facility or Transfer Coordinator | <input type="radio"/> Commissary |
| <input type="radio"/> Dietary | <input type="radio"/> Trust Fund |
| <input checked="" type="radio"/> Personal Property <u>computerized calculator</u> | <input type="radio"/> Conditions (cell conditions, cleaning supplies) |
| <input type="radio"/> Mailroom/Publications | <input type="radio"/> Disciplinary Report dated _____ |
| <input type="radio"/> Assignment (job, cell) | Incident # _____ |
| | <input type="radio"/> Other _____ |

Based on a review of all available information, this office has determined your grievance to be:

- | | |
|--|--|
| <input type="radio"/> Affirmed, Warden _____ is advised to provide a written response of corrective action to this office by _____. | <input type="radio"/> Denied as the facility is following the procedures outlined in DR525. |
| <input type="radio"/> Denied, in accordance with DR504F, this is an administrative decision. | <input type="radio"/> Denied as Cell Assignment/Housing is consistent with the Department's determination of the appropriate Operational capacity of each facility. |
| <input checked="" type="radio"/> Denied, this office finds the issue was appropriately addressed by the facility Administration. | <input type="radio"/> Denied as procedures were followed in accordance with DR 420 for removal/denial of an offender from/for an assignment. |
| <input type="radio"/> Denied in accordance with AD05.03.103A (Monetary Compensation for Inmate Assignments) | <input type="radio"/> Denied as this office finds no violation of the offender's due process in accordance with DR504.80 and DR504.30. This office is reasonably satisfied the offender committed the offense cited in the report. |
| <input type="radio"/> Denied, as the transfer denial by the facility/TCO on _____ was reviewed in accordance with transfer procedures and is an administrative decision. | <input type="radio"/> Denied as the security staff are following the established schedule for dispensing cleaning supplies to the offender when possible. |
| <input type="radio"/> In addition, property items are to be disposed of in accordance with DR501C. | |
| <input checked="" type="radio"/> Other: <u>Offender failed to provide proof to ARB of ownership of calculator. Disposition of staff is an administrative decision.</u> | |

FOR THE BOARD: Leslie McCarty
Leslie McCarty
Administrative Review Board

CONCURRED: Donald Stolworthy
Donald Stolworthy
Director

CC: Warden, Stateville Correctional Center
Hanks, Edward Register No. W21633

STATE OF ILLINOIS - DEPARTMENT OF CORRECTIONS
PROGRAM COMMITTEE
FINAL SUMMARY REPORT

EXHIBIT-I

Name: HANKS, EDWARD IDOC Number: N21633 Race: BLK
Hearing Date/Time: 5/8/2015 01:25 PM Living Unit: STA-X-UE-04 Orientation Status: N/A
Incident Number: 201501294/1 - STA Status: Expunged Final

Incident Number: 201501294/1 - STA			Status: Expunged Final	
Date	Ticket #	Incident Officer	Location	Time
5/1/2015	201501294/1-STA	TEAM, TACT	X-HOUSE	08:30 AM
Offense	Violation	Final Result		
308	Contraband/Unauthorized Property			
Witness Type	Witness ID	Witness Name	Witness Status	
No Witness Requested				

RECORD OF PROCEEDINGS

REPORT READ INMATE STATED THIS IS MY RADIO. THE CASSETTE PLAYER DOESN'T WORK AND ONLY THE RADIO WORK. YOU CAN'T RECORD ON THIS BLACK DECK RADIO CASSETTE DUE TO CASSETTE BEING BROKEN. INMATE PRODUCED A OLS DUMMARY ON THE ISSUE THAT WAS DISMISSED WHEN LT JOHNNIE FRANKLIN CHAIRED THE COMMITTEE AND HE PRODUCED ANOTHER LETTER HE TYPED IN 2012 TO A LT WHILE AT MEN CC TO TRY AND GET HIS CASSETTE COMPONENT FIX

BASIS FOR DECISION

INMATE PRODUCED DOCUMENTATION TO SHOW RADIO WAS RETURNED TO HIM OVER PREVIOUS ISSUED IDR OVER THE SAME CHARGED AND PROOF THAT CASSETTE TAPE PLAYER DOESN'T WORK.

DISCIPLINARY ACTION (Consecutive to any priors)

RECOMMENDED

FINAL

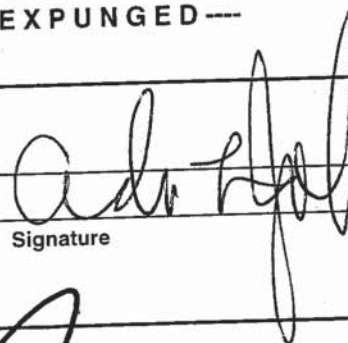
--- EXPUNGED ---

Basis for Discipline:

Signatures

Hearing Committee

JOHNSON, ADA L - Chair Person



05/08/15

BLK


Signature

Date

Race

Recommended Action Approved

Final Comments: N/A



05/19/15

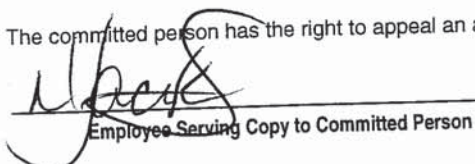
TARRY D WILLIAMS / NRL 5/19/2015

Chief Administrative Officer

Signature

Date

The committed person has the right to appeal an adverse decision through the grievance procedure established by Department Rule 504: Subpart F.


Employee Serving Copy to Committed Person

5/20/15 1134c Unman
When Served -- Date and Time

ILLINOIS DEPARTMENT OF CORRECTIONS
HEARING OF ADMINISTRATIVE REVIEW BOARD
 Video Conference

DATE OF HEARING: March 12, 2015

INSTITUTION: Stateville Correctional Center

GRIEVANT NAME: Edward Hanks, Register No. *N21633*

BOARD MEMBERS PRESENT: Terri Anderson, Administrative Review Board Chairperson, Office of Inmate Issues, Department of Corrections.

Grievant was personally interviewed by the Administrative Review Board. All information submitted to the Board by the Grievant, and the institution related to the issue being grieved, was reviewed. Issues warranting further action / consideration were discussed with the Stateville Correctional Center administration.

Nature of Grievance: Inmate Hanks is grieving denial of Protective Custody.

Findings: The Board notes the inmate is currently serving a 60 year sentence. Records reflect an admission date of May 16, 1997 and release date of December 23, 2042.

Grievant has been housed at the Stateville Correctional Center since November 13, 2013. An affiliation with Vice Lord STG is noted. The grievant has several declared enemies, however currently only one is at Stateville.

The Board reviewed the Protective Custody Status sheet. Grievant requested Protective Custody stating: Upon my initial arrest in January 1993 I was placed in Protective Custody due to my high profile case. I was well known and because of such my life has been threatened, stabbed in county jail I connection with my case. Although the case is old individuals still identify me upon sight and continue to use my case history as a threat. Warden denied requested placement on September 13, 2014.

Inmate's statement to ARB: Been in PC since 1992 because of cases. Individuals involved in Vice Lord organization threatened my life. Left PC because Shawlawn Wright threatened me, over case. Always someone that knows of case.

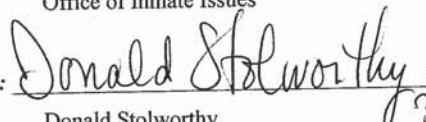
While offender was approved for PC in 1998 there is no information to indicate or support that the safety issue exists at Stateville CC.

Recommendations: Based on a review of all information, it is the opinion of the Board that there is not sufficient information to warrant the offender's retention in Protective Custody and therefore should be released to general population.

FOR THE BOARD:


 Terri Anderson
 Administrative Review Board Chairperson
 Office of Inmate Issues

CONCURRED:

 March 24, 2015
 Donald Stolworthy
 Director

cc: Warden, Stateville Correctional Center
 Edward Hanks, Register No. N21633

**Administrative Review Board
Return of Grievance or Correspondence**

Offender: Hanks Last Name Edward First Name MI ID# N21633

Facility: Stateville CC

☐ Grievance: Facility Grievance # (if applicable) _____ Dated: 3/24/15 or ☐ Correspondence: Dated: _____

Received: 3/31/15 Date Regarding: PC Requests PC

The attached grievance or correspondence is being returned for the following reasons:

Additional information required:

- ☐ Provide a copy of your written Offender's Grievance, DOC 0046, including the counselor's response, if applicable.
- ☐ Provide a copy of the Response to Offender's Grievance, DOC 0047, including the Grievance Officer's and Chief Administrative Officer's response, to appeal.
- ☐ Provide dates of disciplinary reports and facility where incidents occurred.
- ☐ Unable to determine nature of grievance or correspondence; submit additional specific information. Please return the attached grievance or correspondence with the additional information requested to: Administrative Review Board
Office of Inmate Issues
1301 Concordia Court
Springfield, IL 62794-9277

Misdirected:

- ☐ Contact your correctional counselor regarding this issue.
- ☐ Request restoration of Statutory Sentence Credits to Adjustment Committee. If the request is denied by the facility, utilize the offender grievance process outlined in Department Rule 504 for further consideration.
- ☐ Contact the Record Office with your request or to provide additional information.
- ☐ Personal property issues are to be reviewed at your current facility prior to review by the Administrative Review Board.
- ☐ Address concerns to: Illinois Prisoner Review Board
319 E. Madison St., Suite A
Springfield, IL 62706

No further redress:

- ☐ Award of Supplemental Sentence Credits are discretionary administrative decisions; therefore, this issue will not be addressed further.
- ☐ Not submitted in the timeframe outlined in Department Rule 504; therefore, this issue will not be addressed further.
- ☐ This office previously addressed this issue on _____ Date
- ☐ No justification provided for additional consideration.

Other (specify):

Offender is in PC. Grievance met
as of 3/30/15

Completed by: Leslie McCarty Print Name

Leslie McCarty Signature

4/28/15 Date

Distribution: Offender
Inmate Issues

Printed on Recycled Paper

DOC 0070 (Rev. 4/2013)

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STATE OF ILLINOIS - DEPARTMENT OF CORRECTIONS

EXHIBIT-L-1

ADJUSTMENT COMMITTEE
FINAL SUMMARY REPORT

Name: HANKS, EDWARD

IDOC Number: N21633

Race: BLK

Hearing Date/Time: 6/23/2015 09:39 AM

Living Unit: STA-F-01-36

Orientation Status: N/A

Incident Number: 201501788/1 - STA

Status: Final

BASIS FOR DECISION

R/O observed inmate Hanks N21633 on top of inmate Morgan N13480 arms interlocked with each other on the bottom bunk.

Inmate Morgan N13480 T shirt was ripped.

Inmate Hanks N21633 identified by his state issued id card.

Inmate Hanks N21633 told the committee that he did fight back.

The committee is satisfied that inmate Hanks N21633 did in fact violate the charges cited.

DISCIPLINARY ACTION (Consecutive to any priors)

RECOMMENDED

1 Months C Grade

1 Months Segregation

1 Months Commissary Restriction

FINAL

1 Months C Grade

1 Months Segregation

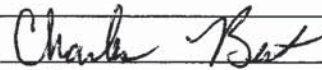
1 Months Commissary Restriction

Basis for Discipline: NATURE OF OFFENSE

Signatures

Hearing Committee

BEST, CHARLES F - Chair Person



06/23/15

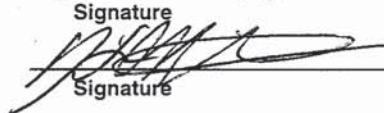
BLK

Signature

Date

Race

WHITTINGTON, KEVIN D



06/23/15

WHI

Signature

Date

Race

Recommended Action Approved

Final Comments: N/A

TARRY D WILLIAMS / NRL 6/30/2015

Chief Administrative Officer

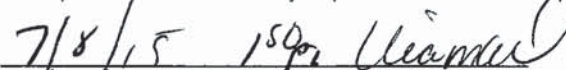
Signature

06/30/15

Date

The committed person has the right to appeal an adverse decision through the grievance procedure established by Department Rule 504: Subpart F.

Employee Serving Copy to Committed Person



When Served -- Date and Time

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EXHIBIT-L-2

State of Illinois)

) SS

County of Will)

Affidavit

I, Robert M. Mead B89739 being first duly sworn under oath depose and state that the foregoing is true and correct and made upon personal knowledge and I am competent to testify thereto.

On June 16, 2015 I heard inmate Brandy Morgan N-13480 (Whom I know very well by some association, and him talking much on the gallery) Tell his cellmate Edward Hanks N-21633, He was going to stomp his brains out, Kick his ass, Etc, Etc In a loud voice as soon as Officer Chana leave the gallery. The officer was at upper East 08 Mr. Wells cell, I was in upper East 07 next door. I was never called as a witness, although I offered to, After I heard her ask Mr. Wells what he saw. We were all in the cells when the incident occurred.

Affiant further sayeth not.

I swear under the penalty of perjury to the above facts.

Date: January 30, 2016

Robert M. Mead
B-89739

PO Box 112

Joliet, IL 60434

STATE OF ILLINOIS

EXHIBIT L-3

COUNTY of WILL

SS

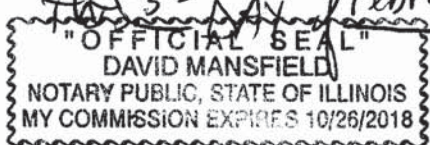
AFFIDAVIT

I, ROBERT JONES, Being FIRST Duly Sworn UNDER OATH
DEPOSE AND STATE THAT THE FOREGOING IS TRUE AND CORRECT
AND MADE UPON PERSONAL KNOWLEDGE AND I AM COMPETENT TO
TESTIFY THERE TO.

EARLY MORNING OF JUNE 16, 2015, I HEARD BRANDY
WORGAN N-13480 VOICE THREATENING EDWARD HANKS N-21633
IN 04 CELL UPPER EAST IN X-HOUSE, THE UNIT FOR
PROTECTIVE CUSTODY. HE WAS SAYING HE WOULD KILL HIM,
BEAT HIS ASS AND A LOT OF OTHER STUFF. OFFICER
CHANA WAS DOWN THE GALLERY AT UPPER EAST 08, AS SOON
AS HE WALKED OFF THE GALLERY, I HEARD FLESH SMACKING
FLESH AND THEN A FEW MOMENTS LATER Tussling AS LIKE
A fight going on in their cell.

AFFIDANT FURTHER SAYS THAT NOT, I SWEAR UNDER
THE PENALTY OF PERJURY TO THESE STATEMENTS.

SIGNED AND SWORN to before me on
this 3rd day of February 2016.



David Mansfield
NOTARY PUBLIC

Robert Jones
R00928
P.O. Box 112
Solter, IL 60434

EXHIBIT-L4

STATE OF ILLINOIS)
 County of Will) SS

AFFIDAVIT

I FRANK MORGAN, THE UNDERSIGNED AND AUTHOR
 OF THIS AFFIDAVIT WAS ASSIGNED IN INMATE MORGAN'S
 CELL WHO HAS THE SAME LAST NAME AS MY OWN, HIS
 NUMBER IS N-13480.

I WAS PUT IN THIS CELL WHILE I WAS ON A HUNGER
 STRIKE, MOVED FROM AULTA HOUSE TO XHOUSE AND TOLD
 I HAD TO GO IN THE CELL WITH THIS INMATE INNOVATION
 OF THE STRIKE RULES. WHICH STATE THAT INMATES ARE
 TO BE ASSIGNED TO SINGLE CELLS WHILE ON HUNGER STRIKE.

THIS INMATE TRIED TO INTIMIDATE THE ABOVE NAMED
 PERSON WITH THREATS ABOUT WHAT HE WOULD DO TO ME IF
 THEY DON'T MOVE ME OUT OF HIS CELL. HE TOLD ME HE
 WAS A "B D" AND THAT I WAS IN HIS WAY, AND HE
 WAS GOING TO ASSAULT ME IF I DON'T MOVE. I WAS
 SLEEPING ON MY PROPERTY BOX BECAUSE I WAS UNABLE
 TO CLIMB ON THE TOP BUNK. THIS WRITER IS 63 YEARS
 OF AGE WITH A BAD BACK FROM AN INJURY. SECURITY
 STAFF PLACED ME IN THE CELL WITH THIS INMATE
 KNOWING HE IS A SECURITY THREAT GROUP MEMBER,

DATE: 6/25/2015

Frank Morgan
 Reg. No. C-15154

EXHIBIT M

**Illinois
Department of
Corrections**

Bruce Rauner
Governor

Gladys C. Taylor
Acting Director

1301 Concordia Court • P.O. Box 19277
Springfield IL 62794-9277

Telephone: (217) 558-2200
TDD: (800) 526-0844

June 23, 2015

Edward Hanks
Register No. N21633
Stateville Correctional Center

Dear Mr. Hanks:

This is in response to your recent request for Protective Custody placement. In accordance with DR501D, the Stateville Correctional Center administration notified you that your request for protective custody was denied on May 13, 2015. This office has determined the issue will be addressed without a formal hearing.


A prior review was conducted by the Administrative Review Board relative to the denial of protective custody placement while at the Stateville Correctional Center. The Director denied the request for protective custody placement at that time.

In your recent request dated March 27, 2015, you state you have been housed in Protective Custody for over 20 years due to a conviction of 7 sexual assault cases which was highly televised. Because of such known and unknown family members of victims has threaten my life along with Vice Lords to whom members were associated. I left PC because a new threat arose when Shawlawn Wright threaten me because of my case that's constantly broadcast because I am still in court. His family works here.

This is the same reason that Hanks provided in the March 12, 2015 hearing. Hanks provides no specific individuals that have threatened him nor any information regarding victims related to anyone incarcerated. Offenders are continually reviewed while in Protective Custody to evaluate the necessity of continued protective custody placement. There is no evidence to support continued placement.

Therefore, this office recommends Offender Hanks request for Protective Custody placement be denied and he be returned to General Population.

For The Board: _____


Terri Anderson
Administrative Review Board
Office of Inmate Issues

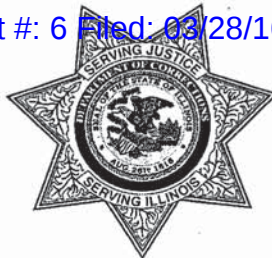
Concurred: _____


Gladys C. Taylor
Acting Director

CC: Warden, Stateville CC
Edward Hanks, Register No. N21633

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Bruce Rauner
Governor



John Baldwin
Acting Director

EXHIBIT-N

The Illinois Department of Corrections

1301 Concordia Court, P.O. Box 19277 • Springfield, IL 62794-9277 • (217) 558-2200 TDD: (800) 526-0844

November 18, 2015

Edward Hanks
Register No. N21633
Stateville Correctional Center

Dear Mr. Hanks:

This is in response to your recent request for Protective Custody placement. In accordance with DR501D, the Stateville Correctional Center administration notified you that your request for protective custody was denied on July 16, 2015. This office has determined the issue will be addressed without a formal hearing.

Two prior reviews have been conducted by the Administrative Review Board relative to the denial of protective custody placement while at the Stateville Correctional Center. The Director denied the request for protective custody placement in those reviews.

In your recent request dated July 16, 2015, you state you were assaulted in the county jail and that problems continue to exist because of high profile case regarding aggravated sexual assaults, Vice Lord gangsters like recent incident with Brandy Morgan assaulting me while waiting for PC approval. Harassment by staff because family and friends dislike my charge without knowing the details.

These are essentially the same reasons as provided in past reviews. The claim of safety concerns has not been substantiated.

Therefore, this office recommends Offender Hanks' request for Protective Custody placement be denied and he be returned to General Population.

For The Board: _____

Terri Anderson
Administrative Review Board
Office of Inmate Issues

Concurred: _____

John Baldwin
Acting Director

CC: Warden, Stateville CC
Edward Hanks, Register N21633

Mission: To serve justice in Illinois and increase public safety by promoting positive change in offender behavior, operating successful reentry programs, and reducing victimization.

www.illinois.gov/idoc

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PREVIOUS LAWSUITS FILED

A. NAME OF CASE: HANKS V. FAIRMAN, et al.

APPROXIMATE FILING DATE: 1994

B. NAME OF CASE HANKS V. DONALD SNYDER, et al.

01-C-4896

APPROXIMATE FILING DATE: 2001

C. NAME OF CASE: HANKS V. STATE OF ILLINOIS

02-CC-4730

APPROXIMATE FILING DATE: 2002

D. NAME OF CASE: HANKS V. ANTHONY RAMOS, et al.

06-195GPM

APPROXIMATE FILING DATE: 2006

E. NAME OF CASE: HANKS V. DARRYL EDWARD, et al.

09-CV-03024

APPROXIMATE FILING DATE: 2009

IN THE UNITED STATES DISTRICT COURT



U.S. Department of Justice

Civil Division

Washington, DC 20530

JUL 24 2014

Mr. Edward Hanks
P.O. Box 112
Joliet, Illinois 60434

Dear Mr. Hanks:

Thank you for your letter from April 28, 2014, to the United States Department of Justice concerning your legal issues. Your letter was forwarded to the Civil Division of the Department for response.

It does not appear as though this is a matter for the Federal Government. The Department of Justice does not have direct oversight over the administration of a prison in the state of Illinois.

We thank you for your inquiry and regret that the Department of Justice cannot be of further assistance to you in this matter.

Sincerely,

Communications Office
Civil Division
U.S. Department of Justice

Ref. 169099/FF

LAW OFFICES OF
MORRISROE & ASSOCIATES, LTD.

114 S. BLOOMINGDALE ROAD
BLOOMINGDALE, ILLINOIS 60108-1239

TELEPHONE (630) 539-0880
FACSIMILE (630) 539-0820

CONFIDENTIAL LEGAL CORRESPONDENCE INSIDE

December 18, 2015

Edward Hanks
Inmate #N21633
Stateville Correctional Center
P.O. Box 112
Joliet, Illinois 60434

Re: Request for Engagement as Counsel

Dear Edward:

This letter will serve to confirm that, after reviewing the information provided, we will not be handling your case. Accordingly, no action will be undertaken on your behalf. We strongly urge you to consult with other legal counsel of your choosing. There is a potential statute of limitations issue in this matter that is upcoming in your case, so please do not hesitate if you wish to seek other legal counsel.

We appreciate your decision to contact us and wish you the best of luck in pursuing your claims.

Very truly yours,

MORRISROE & ASSOCIATES, LTD.



John R. Madden
JRM/pg
Enc.

Mr. Edward Hanks N-21633
P.O. Box 112 Joliet, Ill.
60434



Prisoner Correspondence
Clerk's Office
U.S. District Court
219 South Dearborn St.
Chicago, Illinois 60604

16-cv-2471
Judge James B. Zagel
Magistrate Judge Sidney I. Schenkier
PC9

RECEIVED
FEB 19 2016
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Legal Mail

Legal Mail

